

FREEDOM COURT REPORTING

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<p>1 IN THE UNITED STATES DISTRICT COURT</p> <p>2 FOR THE MIDDLE DISTRICT OF ALABAMA</p> <p>3 EASTERN DIVISION</p> <p>4</p> <p>5 CIVIL ACTION NO.: 3:06CV-00124-WHA-CSC</p> <p>6</p> <p>7 JOHNNY POTTS and JANICE POTTS,</p> <p>8 Plaintiffs,</p> <p>9 vs.</p> <p>10 DYNACORP INTERNATIONAL, L.L.C.,</p> <p>11 JAMES MCCANTS, et al,</p> <p>12 Defendants.</p> <p>13 DEPOSITION OF: JAMES D. MCCANTS</p> <p>14 10:45 A.M.</p> <p>15 JUNE 13, 2006</p> <p>16 In accordance with Rule 5(d) of The</p> <p>17 Alabama Rules of Civil Procedure, as</p> <p>18 Amended, effective May 15, 1988, I, Cindy</p> <p>19 C. Goldman, am hereby delivering to</p> <p>20 Ms. Nancy Eady the original transcript of</p> <p>21 the oral testimony taken on the 13th day</p> <p>22 of June, 2006, along with exhibits.</p> <p>23</p>	<p>1</p> <p>2</p> <p>3 STIPULATIONS</p> <p>4 (continued)</p> <p>5</p> <p>6 IT IS FURTHER STIPULATED AND AGREED</p> <p>7 that it shall not be necessary for any</p> <p>8 objections to be made by counsel to any</p> <p>9 questions except as to form or leading</p> <p>10 questions, and that counsel for the</p> <p>11 parties may make objections and assign</p> <p>12 grounds at the time of trial or at the</p> <p>13 time said deposition is offered in</p> <p>14 evidence or prior thereto.</p> <p>15</p> <p>16 IT IS FURTHER STIPULATED AND AGREED</p> <p>17 that the notice of filing of the</p> <p>18 deposition is waived.</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p>
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<p>1 STIPULATIONS</p> <p>2 IT IS STIPULATED AND AGREED by and</p> <p>3 between the parties through their</p> <p>4 respective counsel that the deposition of</p> <p>5 James D. McCants, a witness in the</p> <p>6 above-entitled cause may be taken before</p> <p>7 Cindy C. Goldman, a Court Reporter and</p> <p>8 Notary Public for the State of Alabama,</p> <p>9 at 2301 Sullivan Road, College Park,</p> <p>10 Georgia 30337, on the 13th day of June,</p> <p>11 2006, commencing at 10:45 a.m., pursuant</p> <p>12 to the Federal Rules of Civil Procedure.</p> <p>13</p> <p>14</p> <p>15 IT IS FURTHER STIPULATED AND AGREED</p> <p>16 that the signature to and the reading of</p> <p>17 the deposition by the witness is waived,</p> <p>18 the deposition to have the same force and</p> <p>19 effect as if full compliance had been had</p> <p>20 with all laws and rules of court relating</p> <p>21 to the taking of the depositions.</p> <p>22</p> <p>23</p>	<p>1 APPEARANCES</p> <p>2</p> <p>3 Appearing On Behalf Of The Plaintiff:</p> <p>4 MORRIS, HAYNES & HORNSBY</p> <p>5 Ms. Nancy Eady</p> <p>6 131 Main Street</p> <p>7 Alexander City, Alabama 35011</p> <p>8</p> <p>9 Appearing On Behalf Of The Defendants:</p> <p>10 BARNES & RADNEY, P.C.</p> <p>11 Mr. W. Larken Radney, III</p> <p>12 80 North Central Avenue</p> <p>13 Alexander City, Alabama 35010</p> <p>14 ARMBRECHT JACKSON, L.L.P.</p> <p>15 Mr. William Holman, II</p> <p>16 63 South Royal Street</p> <p>17 13th Floor Riverview Plaza</p> <p>18 Mobile, Alabama 36602</p> <p>19</p> <p>20 Reported By:</p> <p>21 Cindy C. Goldman</p> <p>22 Freedom Court Reporting</p> <p>23 367 Valley Avenue</p> <p>Birmingham, Alabama 35209</p>

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<p>1 number 419-25-5995?</p> <p>2 A. Yes, ma'am.</p> <p>3 Q. Okay. Mr. McCants, tell me</p> <p>4 about your education.</p> <p>5 A. I went to Excel High School.</p> <p>6 Q. And where is that?</p> <p>7 A. In Excel, Alabama.</p> <p>8 Q. E-x-c-e-l.</p> <p>9 A. Yes, ma'am.</p> <p>10 Q. And when did you graduate?</p> <p>11 A. May of '88.</p> <p>12 Q. And how long had you been in</p> <p>13 high school in Alabama?</p> <p>14 A. The whole time, 12 years.</p> <p>15 Q. Okay. Did you grow up in</p> <p>16 Alabama?</p> <p>17 A. Yes, ma'am.</p> <p>18 Q. Okay. And what town did you</p> <p>19 grow up in?</p> <p>20 A. Repton.</p> <p>21 Q. Repton.</p> <p>22 All right. After you graduated</p> <p>23 from high school, what happened with you</p>	<p>1 Q. Were you still in Repton?</p> <p>2 A. Yes, ma'am.</p> <p>3 Q. All right. And then in June of</p> <p>4 1991 when you went into the regular Army,</p> <p>5 where were you sent?</p> <p>6 A. Germany.</p> <p>7 Q. And how long in the course of</p> <p>8 your military service from June of --</p> <p>9 well, how long were you in the military?</p> <p>10 A. From '90 -- from '80 -- I'm</p> <p>11 sorry. From '89 until '94. August of</p> <p>12 '94.</p> <p>13 Q. During that time, where did you</p> <p>14 declare your residency?</p> <p>15 A. I don't understand the question.</p> <p>16 Q. My dad was in the Navy, and he's</p> <p>17 from Illinois. And we moved around all</p> <p>18 over the place, but because he was in the</p> <p>19 military, he always was a citizen of</p> <p>20 Illinois. He never changed that. During</p> <p>21 the time you were in the military,</p> <p>22 where -- what was your citizenship?</p> <p>23 A. Okay. Home of record would have</p>
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<p>1 education or career wise?</p> <p>2 A. I went to college for a year.</p> <p>3 Q. And where was that?</p> <p>4 A. Monroeville.</p> <p>5 Q. All right. And then what?</p> <p>6 A. That was it.</p> <p>7 Q. Okay. And then after you went</p> <p>8 to college for one year, what did you do?</p> <p>9 A. I went into the military.</p> <p>10 Q. And what branch of the service?</p> <p>11 A. National Guard and then regular</p> <p>12 Army.</p> <p>13 Q. And what year was that that you</p> <p>14 started with the National Guard?</p> <p>15 A. June of '89.</p> <p>16 Q. And then when did you move over</p> <p>17 to regular military?</p> <p>18 A. I want to say it was June of</p> <p>19 '91.</p> <p>20 Q. When you went into the National</p> <p>21 Guard June of '89 until June of 1991,</p> <p>22 what state did you live in?</p> <p>23 A. Alabama.</p>	<p>1 been Monroeville. I mean, I'm sorry.</p> <p>2 Repton, Alabama. I'm sorry.</p> <p>3 Q. And that was true through August</p> <p>4 of 1994?</p> <p>5 A. Yes, ma'am.</p> <p>6 Q. When you left the military in</p> <p>7 August of 1994, what did you do?</p> <p>8 A. Came back to Repton, Alabama.</p> <p>9 Q. And did you have employment</p> <p>10 then?</p> <p>11 A. Yes, ma'am.</p> <p>12 Q. And where was that?</p> <p>13 A. Chick-Dee.</p> <p>14 Q. Chick-Dee?</p> <p>15 A. Yes, ma'am. And Wal-Mart.</p> <p>16 Q. And where were they?</p> <p>17 A. Monroeville.</p> <p>18 Q. And Wal-Mart also?</p> <p>19 A. Yes, ma'am.</p> <p>20 Q. What did you do for Chick-Dee?</p> <p>21 A. Cashier, cook.</p> <p>22 Q. And Wal-Mart?</p> <p>23 A. Stock and personnel.</p>

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<p>1 Q. Why did you leave the military?</p> <p>2 A. Got out on a chapter.</p> <p>3 Q. On a --</p> <p>4 A. Chapter 13.</p> <p>5 Q. What -- I don't know what that</p> <p>6 means.</p> <p>7 A. Got in trouble and had an</p> <p>8 Article 15.</p> <p>9 Q. Okay. Is that dishonorable</p> <p>10 discharge?</p> <p>11 A. No, ma'am. Honorable.</p> <p>12 Q. Okay. Explain -- Chapter 13 and</p> <p>13 Article 15 means something to you, but,</p> <p>14 to me, it doesn't. What is an Article</p> <p>15 15?</p> <p>16 A. No problem. It was disciplinary</p> <p>17 action.</p> <p>18 Q. What for?</p> <p>19 A. Fighting.</p> <p>20 Q. All right. And what was that --</p> <p>21 what was that disciplinary action then?</p> <p>22 A. I got chaptered out of the</p> <p>23 military.</p>	<p>1 A. P-3 (sic).</p> <p>2 Q. And then when you rejoined in</p> <p>3 October of 1998, what was your rank?</p> <p>4 A. P-3 (sic).</p> <p>5 Q. All right. And was this the</p> <p>6 regular Army?</p> <p>7 A. Yes, ma'am.</p> <p>8 Q. And how long were you back with</p> <p>9 the regular Army?</p> <p>10 A. '98 until December '01.</p> <p>11 Q. And why did you leave in</p> <p>12 December of 2001?</p> <p>13 A. I got an Article 15.</p> <p>14 Q. And that was a disciplinary</p> <p>15 action?</p> <p>16 A. Yes, ma'am.</p> <p>17 Q. And what was that for?</p> <p>18 A. Fighting.</p> <p>19 Q. And, again, that was an</p> <p>20 honorable discharge?</p> <p>21 A. Yes, ma'am.</p> <p>22 Q. Then in December of 2001, what</p> <p>23 did you do?</p>
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<p>1 Q. All right. And that's when you</p> <p>2 went home?</p> <p>3 A. Yes, ma'am.</p> <p>4 Q. Okay. But it was an honorable</p> <p>5 discharge?</p> <p>6 A. Yes, ma'am.</p> <p>7 Q. All right. How long were you in</p> <p>8 Alabama after you left the military?</p> <p>9 A. '94 until October of '98.</p> <p>10 Q. Did you work anywhere besides</p> <p>11 Chick-Dee and Wal-Mart during that time?</p> <p>12 A. No, ma'am.</p> <p>13 Q. All right. Then in October of</p> <p>14 1998, what did you do career wise?</p> <p>15 A. In October of '98, I went back</p> <p>16 into the military.</p> <p>17 Q. When you joined the military the</p> <p>18 first time in -- when you got into the</p> <p>19 regular Army in June of 1991, what was</p> <p>20 your rank, if you remember?</p> <p>21 A. I don't remember right offhand.</p> <p>22 Q. When you left in August of 1994,</p> <p>23 do you remember what your rank was?</p>	<p>1 A. Moved to Georgia.</p> <p>2 Q. When you were in the military at</p> <p>3 Fort Bragg, where was your home of</p> <p>4 record?</p> <p>5 A. Steele, Alabama.</p> <p>6 Q. All right. And did you find</p> <p>7 employment after December of 2001?</p> <p>8 A. Yes, ma'am.</p> <p>9 Q. And where was that?</p> <p>10 A. At a tire company in McDonough.</p> <p>11 Q. And do you remember the name of</p> <p>12 the tire company?</p> <p>13 A. No, ma'am.</p> <p>14 Q. All right. Where was -- what</p> <p>15 was your position with them?</p> <p>16 A. Laborer.</p> <p>17 Q. That was a tire manufacturer</p> <p>18 then, not a retailer?</p> <p>19 A. Yes, ma'am. I was a puller.</p> <p>20 Q. And how long did you do that?</p> <p>21 A. Six months.</p> <p>22 Q. And then what happened?</p> <p>23 A. I started working for the</p>

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<p>1 Braves at the same time?</p> <p>2 A. Yes, ma'am.</p> <p>3 Q. All right. So, you worked two</p> <p>4 jobs for July and August of 2005?</p> <p>5 A. Yes, ma'am.</p> <p>6 Q. And with Braves, have you been</p> <p>7 personal security throughout your</p> <p>8 employment with them?</p> <p>9 A. Yes, ma'am.</p> <p>10 Q. What's your father's full name?</p> <p>11 A. James Floyd, F-l-o-y-d, same</p> <p>12 last name, McCants.</p> <p>13 Q. Do you have any cousins that</p> <p>14 would be -- that are also called James</p> <p>15 Derrick McCants?</p> <p>16 A. No, ma'am.</p> <p>17 Q. Okay. Are you currently</p> <p>18 married?</p> <p>19 A. Yes, ma'am.</p> <p>20 Q. And your wife is Caryl?</p> <p>21 A. Yes, ma'am.</p> <p>22 Q. C-a-r-y-l?</p> <p>23 A. Yes, ma'am.</p>	<p>1 Q. Did you have any children from</p> <p>2 that marriage?</p> <p>3 A. Yes, ma'am.</p> <p>4 Q. How many?</p> <p>5 A. One.</p> <p>6 Q. And how old -- is it a he or a</p> <p>7 she?</p> <p>8 A. He.</p> <p>9 Q. And how old is he now?</p> <p>10 A. 15.</p> <p>11 Q. And where does Ms. McCants live</p> <p>12 now -- Ms. Millender. I'm sorry. His</p> <p>13 mother, Debra Millender?</p> <p>14 A. South Carolina.</p> <p>15 Q. And when y'all were originally</p> <p>16 married, where were you married?</p> <p>17 A. Excel, Alabama.</p> <p>18 Q. And when was that?</p> <p>19 A. April 2000. No. No. I'm</p> <p>20 sorry. I'm sorry.</p> <p>21 MS. EADY: Off the record.</p> <p>22 (A short discussion was held.)</p> <p>23 Q. (By Ms. Eady) Can you go back to</p>
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<p>1 Q. And her maiden name -- well, can</p> <p>2 you tell me her maiden name?</p> <p>3 A. Yes, ma'am. It's Burton,</p> <p>4 B-u-r-t-o-n.</p> <p>5 Q. And where is she from?</p> <p>6 A. California.</p> <p>7 Q. And where did the two of y'all</p> <p>8 meet?</p> <p>9 A. Monroeville.</p> <p>10 Q. And when did y'all get married?</p> <p>11 A. September of '98.</p> <p>12 Q. And where was that marriage?</p> <p>13 A. Monroeville.</p> <p>14 Q. Had you ever been married before</p> <p>15 Ms. Burton?</p> <p>16 A. Yes, ma'am.</p> <p>17 Q. All right. How many times?</p> <p>18 A. Twice.</p> <p>19 Q. All right. Who was your first</p> <p>20 wife?</p> <p>21 A. Debra, D-e-b-r-a?</p> <p>22 Q. Uh-huh.</p> <p>23 A. She's a Millender now.</p>	<p>1 my question where it says when were the</p> <p>2 two of y'all married, and just pick back</p> <p>3 up there?</p> <p>4 A. April of '90. I'm sorry.</p> <p>5 Q. And how long were y'all married?</p> <p>6 A. Five years.</p> <p>7 Q. And when were you divorced?</p> <p>8 Well, were you divorced in 1995?</p> <p>9 A. Yes, ma'am.</p> <p>10 Q. And where were you divorced?</p> <p>11 A. Monroeville.</p> <p>12 Q. The Monroeville judge entered a</p> <p>13 decree of divorce?</p> <p>14 A. Yes, ma'am.</p> <p>15 Q. An order saying y'all were</p> <p>16 divorced. Was there child support as</p> <p>17 part of that order?</p> <p>18 A. Yes, ma'am.</p> <p>19 Q. Were you paying child support,</p> <p>20 or -- you were paying child support to</p> <p>21 your ex-wife?</p> <p>22 A. Yes, ma'am.</p> <p>23 Q. And then what was your second</p>

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<p>1 marriage? Who was the second person you 2 married? 3 A. Tammy Gulley. 4 Q. All right. And where was she 5 from? 6 A. Frisco City. 7 Q. And where did y'all get married? 8 A. Monroeville. 9 Q. What year did y'all get married? 10 A. I want to say '96. 11 Q. And did y'all have any children? 12 A. No, ma'am. 13 Q. And when did you get divorced? 14 A. '96. 15 Q. And where was that divorce? 16 A. Monroeville. 17 Q. And, again, the judge entered a 18 decree of divorce? 19 A. Yes, ma'am. 20 Q. Did you ever have a child 21 support action brought against you on 22 behalf of Ms. -- Debra for failing to pay 23 child support?</p>	<p>1 Q. When was that? 2 A. I don't actually remember the 3 exact year. 4 Q. Was it before Iraq or after 5 Iraq? 6 A. It was before. 7 Q. Did you have an attorney? 8 A. No, ma'am. It was by the Court. 9 Q. And what happened there? 10 A. Because I was paying it, and 11 they couldn't find her. And she moved to 12 another state. And then she -- I think 13 she tried to file it again from there. 14 And then they threw -- they dismissed it. 15 Q. Okay. You were paying the child 16 support where? 17 A. To Monroeville. 18 Q. To the Monroeville -- to the 19 courthouse in Monroeville? 20 A. Yes, ma'am. 21 Q. All right. And they were 22 supposed to be forwarding it to your 23 ex-wife?</p>
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<p>1 A. No, ma'am. 2 Q. Was there any other action 3 involving your divorce filed in 4 Alabama -- 5 A. No, ma'am. 6 Q. -- with Ms. McCants? 7 A. No, ma'am, not to my knowledge, 8 it wasn't. 9 Q. Okay. Have you paid your child 10 support? 11 A. Yes, ma'am. 12 I don't pay any now because -- 13 because it got thrown -- it actually got 14 thrown out of court. We went back to 15 court for it. 16 Q. Uh-huh. Who went back to court 17 for child support? 18 A. I did. 19 Q. You went back to court to have 20 the child support terminated? 21 A. Yes, ma'am. 22 Q. And where was that? 23 A. Monroeville.</p>	<p>1 A. Yes, ma'am. 2 Q. And she moved? 3 A. Yes, ma'am. 4 Q. And they didn't know where to 5 send it? 6 A. Yes, ma'am. 7 Q. So, you went back to court and 8 said, "If you're not going to send it to 9 her, I don't think I should have to pay 10 it"; is that right? 11 A. No, ma'am. 12 Q. That's where I'm getting 13 confused. 14 A. No, ma'am. I never said I don't 15 think I should have to pay it. 16 (Plaintiff's Exhibit No. 1 was 17 marked for identification.) 18 Q. (By Ms. Eady) Uh-huh. I'm going 19 to attach this as Exhibit 1. It is a 20 printout from what's called Alacourt. It 21 lists cases that are filed in different 22 courts. 23 And this is why I was asking you</p>

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<p style="text-align: right;">Page 33</p> <p>1 about the child support issue. This</p> <p>2 shows -- let's go off the record for a</p> <p>3 minute.</p> <p>4 (A short discussion was held.)</p> <p>5 Q. (By Ms. Eady) Let's try it this</p> <p>6 way: When you divorced Debra Sue</p> <p>7 McCants --</p> <p>8 A. Yes, ma'am.</p> <p>9 Q. -- the judge issued an order</p> <p>10 divorcing to two of y'all; right?</p> <p>11 A. Yes, ma'am.</p> <p>12 Q. And there were some obligations</p> <p>13 in that order that you needed to comply</p> <p>14 with; correct?</p> <p>15 A. Yes, ma'am.</p> <p>16 Q. All right. And that included</p> <p>17 the obligation to pay child support?</p> <p>18 A. Yes, ma'am.</p> <p>19 Q. All right. At some point in</p> <p>20 time, you no longer had to pay child</p> <p>21 support; is that correct?</p> <p>22 A. Yes, ma'am.</p> <p>23 Q. All right. Did you get another</p>	<p style="text-align: right;">Page 35</p> <p>1 A. They told me, I mean, I could</p> <p>2 continue to just keep paying them there.</p> <p>3 But, you know, they -- I mean, they</p> <p>4 didn't have nowhere to send the money to.</p> <p>5 Didn't have a forwarding address or</p> <p>6 anything.</p> <p>7 Q. Uh-huh.</p> <p>8 A. So, they told me, you know, I</p> <p>9 needed to go and try and take care of it.</p> <p>10 Q. Needed to go and try and take</p> <p>11 care of it in what way?</p> <p>12 A. As to try to find if I could get</p> <p>13 a forwarding address from my ex-wife at</p> <p>14 that time.</p> <p>15 Q. Uh-huh. Did you try and do</p> <p>16 that?</p> <p>17 A. Yes, ma'am.</p> <p>18 Q. Okay. And then were you</p> <p>19 successful?</p> <p>20 A. No, ma'am.</p> <p>21 Q. And then what happened?</p> <p>22 A. My mother told me -- I can't</p> <p>23 think of the lawyer's name. We went to</p>
<p style="text-align: right;">Page 34</p> <p>1 order from a judge that said that?</p> <p>2 A. Yes, ma'am. But I don't</p> <p>3 remember what month exactly that was.</p> <p>4 Q. Do you recall what year that</p> <p>5 was?</p> <p>6 A. No ma'am, not right offhand, I</p> <p>7 don't.</p> <p>8 Q. What led to the judge giving the</p> <p>9 order that you didn't have to pay anymore</p> <p>10 child support?</p> <p>11 A. What do you mean?</p> <p>12 Q. How did that happen?</p> <p>13 A. I kept going every month to the</p> <p>14 courthouse making my payments, making my</p> <p>15 payments.</p> <p>16 Q. Okay.</p> <p>17 A. And they were logging them in.</p> <p>18 And the people at the courthouse where I</p> <p>19 was making my payments to, they were</p> <p>20 saying, "Well, you're making these</p> <p>21 payments, but we have them all still on</p> <p>22 file, and they keep coming back."</p> <p>23 Q. Okay. So, then what happened?</p>	<p style="text-align: right;">Page 36</p> <p>1 court.</p> <p>2 Q. Okay. And when we -- who is</p> <p>3 "we" that went to court?</p> <p>4 A. Me and my mother.</p> <p>5 Q. Did you have a lawyer there with</p> <p>6 you?</p> <p>7 A. It was -- because I couldn't</p> <p>8 afford one, it was the court-appointed</p> <p>9 lawyer.</p> <p>10 Q. Okay. Would you recognize the</p> <p>11 name if you heard it?</p> <p>12 A. I couldn't say if I could or</p> <p>13 not, ma'am.</p> <p>14 Q. So, you went to court, and there</p> <p>15 was a court-appointed lawyer there?</p> <p>16 A. Yes, ma'am.</p> <p>17 Q. Were there two lawyers, a lawyer</p> <p>18 for you and a lawyer for the court or</p> <p>19 just one lawyer?</p> <p>20 A. Just one.</p> <p>21 Q. So, there was a court-appointed</p> <p>22 lawyer there. And what did you and your</p> <p>23 mother do?</p>

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<p style="text-align: right;">Page 37</p> <p>1 A. Asked the -- I really don't 2 remember, ma'am. 3 Q. Did you ask the judge or the 4 lawyer something? 5 A. I asked the lawyer to -- well, 6 he -- I didn't ask him. He basically 7 told us, you know, that the money, it was 8 not being forwarded, you know, to 9 Ms. Millender. Or I don't know if she 10 was a Millender at the time or not. 11 Q. Right. That the money was not 12 being forwarded? 13 A. Yes, ma'am. And he gave us our 14 options. 15 Q. And what were those options? 16 A. I mean, to have it -- I don't 17 know the exact terminology that he used. 18 To have it, I guess, stopped. 19 Q. And what else? 20 A. That was it. 21 Q. Okay. And have it stopped that 22 as you didn't pay child support anymore? 23 A. Yes, ma'am.</p>	<p style="text-align: right;">Page 39</p> <p>1 A. Georgia. 2 Q. Do you have it with you? 3 A. No, ma'am, not right now. 4 Q. You have a current license, 5 though? 6 A. Yes, ma'am. 7 Q. All right. I'll need to get a 8 copy of that. 9 MR. HOLMAN: We'll do that. 10 MS. EADY: Okay. 11 Q. Who is your current employer? 12 A. The Atlanta Braves. 13 Q. That Atlanta Braves. Are you 14 about to go back to Iraq? 15 A. I'm thinking about it. 16 Q. Okay. But you haven't signed on 17 with anybody? 18 A. No, ma'am. 19 Q. Well, have you applied? 20 A. Yes, ma'am. 21 Q. With whom? 22 A. Several companies. 23 Q. And they are? Dyncorp?</p>
<p style="text-align: right;">Page 38</p> <p>1 Q. From that time? 2 A. (Witness nods head 3 affirmatively). 4 Q. Did you get an order from the 5 judge that said that that was okay? 6 A. I want to say yes, ma'am. But I 7 don't really remember. 8 Q. All right. And the judge would 9 have been the judge in Monroeville? 10 A. Yes, ma'am. 11 Q. Do and you and Caryl have any 12 children? 13 A. No, ma'am. 14 Q. When you go overseas to Iraq, 15 where does Caryl stay? 16 A. At her apartment. 17 Q. What state? 18 A. Here in Georgia. 19 Q. Okay. All right. Do you have a 20 driver's license? 21 A. Yes, ma'am. 22 Q. All right. And what state is 23 that driver's license?</p>	<p style="text-align: right;">Page 40</p> <p>1 A. I'm sorry. Go ahead. 2 Q. That's all right. Go ahead and 3 tell me who they are. 4 A. Dyncorp, Blackwater, and 5 Cochise. 6 Q. And is there a -- are you trying 7 to get on as personal security detail 8 again? Or what positions are you seeking 9 from these companies? 10 A. I've just been looking. Just 11 different options to know what's open. 12 Q. Do you currently have a car? 13 A. No, ma'am. 14 Q. Or a truck? 15 A. All right. 16 Q. Do you have a vehicle that you 17 drive right now? 18 A. No, ma'am. 19 Q. All right. Does your wife? 20 A. Yes, ma'am. 21 Q. All right. What does your wife 22 have? 23 A. A Jeep Cherokee.</p>

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<p style="text-align: right;">Page 49</p> <p>1 Q. All right. Do you recall 2 getting a traffic ticket in 1990, a 3 speeding ticket? 4 A. 1990, yes, ma'am. 5 Q. Okay. 6 A. Probably so. 7 Q. Do you recall what the speed 8 was? 9 A. No, ma'am. 10 Q. Do you recall whether you pled 11 guilty or contested the ticket? 12 A. I paid it. 13 Q. Have you ever -- all right. Do 14 you remember a traffic ticket in Alabama 15 in 1997? 16 A. No, ma'am. Not right offhand, I 17 don't. 18 Q. Okay. Did you live at 704 19 Bigger Street, Apartment 14, Monroeville 20 at some time? 21 A. I don't remember. 22 Q. Okay. Did you ever get a 23 traffic ticket, for example, when you</p>	<p style="text-align: right;">Page 51</p> <p>1 a loan from family or friends or 2 whatever. I'm talking about a formal -- 3 like an account you go to buy something, 4 and you pay for it that way, things like 5 that. When was the last time you did 6 something -- 7 A. It's been a long time. 8 Almost -- I want to say maybe eight or 9 nine years ago. 10 Q. Who was that with? 11 A. I had an account with 12 Heilig-Myers. 13 Q. And what happened to that 14 account? 15 A. I paid it off. 16 Q. Did you have any accounts with 17 anybody else in Alabama? 18 A. There was a -- I had a loan 19 with -- I want to say the name of it was 20 Money Tree. I believe that was the name 21 of it. 22 Q. Okay. 23 A. I paid it off as well, ma'am.</p>
<p style="text-align: right;">Page 50</p> <p>1 were in North Carolina up at Fort Bragg? 2 A. I don't remember, ma'am. 3 Q. Or a traffic ticket when you 4 lived in New York? 5 A. Not right off the top of my 6 head, I don't. 7 Q. And any of the other states 8 where you lived? 9 A. No, ma'am, right at this time, I 10 don't. 11 Q. Can a person get a speeding 12 ticket on a base? 13 A. Yes, ma'am. 14 Q. Okay. Have you ever gotten any 15 speeding tickets on any of the bases you 16 were stationed at when you were in the 17 Army? 18 A. No, ma'am, I don't believe I 19 did. 20 Q. Okay. Have you ever borrowed 21 money from anybody in Alabama? 22 A. Yes, ma'am. 23 Q. Okay. And I'm not talking about</p>	<p style="text-align: right;">Page 52</p> <p>1 Q. Anyone else? 2 A. No, ma'am, not that I can 3 remember. 4 Q. Okay. Do you remember something 5 called GCFA Incorporated? 6 A. No, ma'am. 7 Q. Do you remember ever being sued 8 for \$546.50 -- 9 A. No, ma'am. 10 Q. -- about the time that you would 11 have been married to the second wife, 12 Tammy Gulley? 13 A. No, ma'am. 14 Q. In 1996, you lived at Route One, 15 Box 152-A, Repton, Alabama? 16 A. Yes, ma'am. 17 Q. Besides when you were in the 18 military and you were stationed -- when 19 you were in the military, as far as I can 20 tell, were you stationed in New York for 21 a while? 22 A. Yes, ma'am. 23 Q. Were you stationed in North</p>

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